1 **Guenevere Nelson-Melby NELSON-MELBY LAW, PLLC** P.O. Box 65568 3 **Tucson, AZ 85728** TEL: (520) 306-8933 4 GUENEVERE NELSON-MELBY, AZBAR #024745 5 nelsonmelbylaw@gmail.com 6 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE DISTRICT OF ARIZONA 9 10 United States of America, Case No. CR22-02653-JGZ-LCK 11 Plaintiff 12 **MOTION TO MODIFY CONDITIONS OF RELEASE** 13 14 Jose Bacasegua-Barriga 15 Defendant 16 17 Bacasegua-Barriga, through Counsel, respectfully request a Jose 18 19 modification of his conditions of release, specifically to allow him to travel to 20 Mexico for three days to visit his mother, who lives in Nogales, Sonora. His 21 mother is ill. 22 23 Pretrial Services Office Cynthia Mendez has no objection to this travel as 24 long as Mr. Bacasegua-Barriga checks in with her before and after his trip, and 25 26 gives her the detailed information that she requests about the visit. 27 28

1	Assistant U.S. Attorney Craig Russsell does not object to this motion.
2	Cubmitted this 17th day of May 2022
3	Submitted this 17th day of May, 2023
4	0 212 No Que W 002
5	Cuenever Rollin Melly
6	Guenevere Nelson-Melby
7	Attorney for Material Witness
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